

EXHIBIT B

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3

4 C.A. No. 04-11572JLT

5 *****

6
7 SUSAN COONEY

8 Plaintiff

9 vs.

10 SAYBROOK GRADUATE SCHOOL

11 and MAUREEN O'HARA, INDIVIDUALLY

12 Defendants

13 *****

14
15 DEPOSITION OF DENNIS K. NORMAN, a witness

16 called on behalf of the Plaintiff, pursuant to the
17 Massachusetts Rules of Civil Procedure, before Gail A.
18 Carignan, Professional Shorthand Reporter and Notary
19 Public, within and for the Commonwealth of Massachusetts,
20 at the Law Offices of Kerstein Coren Lichtenstein Finkel,
21 LLP, 60 Walnut Street, Wellesley, Massachusetts,
22 commencing at 11:11 a.m. on Tuesday, May 2, 2006.

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- 1 heard of Saybrook.
- 2 Q. Okay. When did you first hear about Saybrook?
- 3 A. I interview intern applicants every year, so I heard
- 4 about it when applicants from that graduate program
- 5 applied for our internship.
- 6 Q. And do you recall when you first became aware of
- 7 that name?
- 8 A. No.
- 9 Q. Would it have been prior to the 1990s?
- 10 A. I have no idea.
- 11 Q. Would it have included any time in the 1990s?
- 12 A. I heard the name in the '90s. I just don't know
- 13 when I first heard it.
- 14 Q. Do you recall the context in which you heard that
- 15 name?
- 16 A. Either looking at an application from someone
- 17 applying for internship, or there were people who
- 18 applied for licensure at the Board of Registration,
- 19 I'd heard the name.
- 20 Q. Do you recall any meetings in which you've
- 21 participated as a Board member where the subject of
- 22 eligibility of persons with a psychology degree from
- 23 Saybrook came up in terms of their eligibility to
- 24 sit for Mass. licensure?

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- 1 A. There was never a discussion of the institution
- 2 being eligible. We reviewed individual applicants.
- 3 Q. But my question was and -- all right. Fair enough.
- 4 Do you recall any particular individuals
- 5 who were students at Saybrook who had graduated
- 6 where the subject of their eligibility for licensure
- 7 in Massachusetts came up?
- 8 A. Not by name.
- 9 Q. Do you remember any discussions involving any
- 10 students or graduates of Saybrook on the issue of
- 11 eligibility to sit for licensure in Massachusetts
- 12 coming up?
- 13 A. I'm not sure how to answer that. In the context of
- 14 someone applying, we had to look at their courses,
- 15 and we had to apply their criteria to that
- 16 individual of whether that individual met
- 17 requirements that are required for a graduate
- 18 program. So in that context, it would have been
- 19 discussed.
- 20 Q. And would that be true for anybody who applied in
- 21 Massachusetts from any institution?
- 22 A. Yes.
- 23 Q. Okay.
- 24 A. With one caveat. There is an organization that

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- 1 accredits or -- it's not a true accreditation, but
- 2 that meets the guidelines and sets the guidelines
- 3 for approved programs in psychology. Programs that
- 4 go through that site visit and are recommended, we
- 5 don't go through every detail of their program
- 6 because they've already been reviewed and been seen
- 7 as graduate training programs -- recognized graduate
- 8 training programs in psychology.
- 9 And I think that the Board at that time
- 10 didn't go over everything about it. They looked at
- 11 everything about the individual from that
- 12 institution and whether they met the requirements of
- 13 courses.
- 14 Q. Do you have any knowledge of any student or graduate
- 15 of a psychology program being refused eligibility to
- 16 sit for a Mass. licensing exam?
- 17 A. There were cases where people were seen by the
- 18 Board, which is a total vote by the Board after a
- 19 hearing, as there were people deemed to not have met
- 20 the requirements, the statutory requirements of
- 21 licensure.
- 22 Q. Do you recall any of those persons specifically --
- 23 A. No.
- 24 Q. -- by name?

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- 1 A. No, I don't.
- 2 Q. Do you recall any of those persons as to what school
- 3 they got their psychology degree from?
- 4 A. I know that we were visited by representatives from
- 5 some schools that had nontraditional ways of getting
- 6 credit. And I don't remember whether it was
- 7 Fielding, whether it was Saybrook. There were -- it
- 8 wasn't Fielding because they eventually got APA
- 9 approved. There were a couple of schools. There
- 10 were a couple of schools that came to talk to the
- 11 Board.
- 12 Q. Does the name "Union" --
- 13 A. That's one. I think that they came to one meeting
- 14 to tell us about their program.
- 15 Q. Now, you've described -- you used the word
- 16 "alternative"?
- 17 A. In the sense that they weren't approved by the
- 18 graduate -- the list we had of approved graduate
- 19 programs in psychology. And there's criteria that
- 20 are listed. And I don't remember the criteria, but
- 21 there's actual criteria that a program has to meet.
- 22 Q. Now, I think you stated you first came on to the
- 23 Board in 1993?
- 24 A. That's correct.